

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case Nos. 1:02-cr-0157 / 07-cv-594
Plaintiff,	:	
	:	<u>Renewed motion for continuance</u>
v.	:	
	:	JUDGE SUSAN J. DLOTT
STEVEN M. RENNICK, SR.	:	
Defendant.	:	CHIEF MAGISTRATE JUDGE
	:	MICHAEL R. MERZ

The United States respectfully moves for a continuance of the evidentiary hearing that is presently scheduled for March 20, 2008. A memorandum in support is attached. Counsel for Rennick does not consent to this motion.

Respectfully submitted,

GREGORY G. LOCKHART
United States Attorney

s/ Benjamin C. Glassman
BENJAMIN C. GLASSMAN
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MEMORANDUM IN SUPPORT OF MOTION

As good cause for an extension, the United States submits that the undersigned is scheduled to begin a jury trial on March 10, 2008. Although that trial hopefully will be complete by March 20, 2008, the timing is uncertain. The place of the jury trial, moreover, has been set in Columbus, Ohio, which will prevent the undersigned from preparing in his office in Cincinnati for the hearing in this matter. Finally, William Gallagher, Rennick's trial counsel and a witness for the evidentiary hearing, has also indicated that March 20, 2008 would present a conflict for him.

A continuance of 2 - 3 weeks would eliminate these problems. Therefore, the United States respectfully seeks a continuance of the March 20, 2008 evidentiary hearing.

Counsel for the United States has consulted with the office of counsel for Rennick regarding whether this motion would be opposed, and has also sent electronic mail to counsel for Rennick regarding the same. By return voicemail, that office has advised that counsel for Rennick does not consent to the continuance requested herein. The office of counsel for Rennick further advised that the requested continuance would likely interfere with a substantial jury trial set for April and that, given Rennick's scheduled date for release from custody

(December 19, 2008), continuing the hearing past counsel's trial would not be in Rennick's interest.

Respectfully submitted,

GREGORY G. LOCKHART
United States Attorney

s/ Benjamin C. Glassman

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Continuance was filed with the Court's CM/ECF System this 22st day of February, 2008, which provides service to Lawrence Joseph Greger, Esq., counsel to Rennick.

s/ Benjamin C. Glassman

BENJAMIN C. GLASSMAN
Assistant United States Attorney